

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

Case No. 24 M 14

the US Express Mail package bearing tracking number
EI 350 581 519 US (Express Mail 2 Day), further
described in Attachment A

Ref. No.

FILED
1/16/2024
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT**

I, Jazzy Pedregosa, a Task Force Officer of the U.S. Postal Inspection Service, request a search warrant and state under penalty of perjury that I have reason to believe that in the following package:

See Attachment A

located in the Northern District of Illinois, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

*Code Section**Offense Description*

Title 21, United States Code, Section 843(b)

narcotics

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.

Jazzy Pedregosa*Applicant's Signature*JAZZY PEDREGOSA, Task Force OfficerU.S. Postal Inspection Service*Printed name and title*

Pursuant to Fed. R. Crim. P. 4.1, this Application is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the statements in the Application and Affidavit by telephone.

Date: January 16, 2024G. A. Fuentes*Judge's signature*City and State: Chicago, IllinoisGABRIEL A. FUENTES, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT)
)
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, Jazzy Pedregosa, being duly sworn, state as follows:

1. I am a Task Force Officer (“TFO”) with the U.S. Postal Inspection Service (“USPIS”). I have been so employed since approximately April 2022.

2. As part of my duties as a USPIS TFO, I investigate criminal violations relating to the federal laws relating to the mails and to controlled substances.

3. This affidavit is made in support of an application for a warrant to search the U.S. Express Mail Parcel with Tracking Number EI 350 581 519 US described further in Attachment A (the “**Subject Parcel**”), for evidence, instrumentalities, and contraband described further in Attachment B, concerning narcotics offenses, in violation of Title 21, United States Code, Section 843(b).

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence, instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcel**.

I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL

5. On January 8, 2024, I inspected the **Subject Parcel** at the U.S. Postal Service (“USPS”) International Service Center located at 11600 West Irving Park Road, in Chicago, Illinois. The **Subject Parcel** was first scanned by the USPS on January 3, 2024, in Ingleside, Illinois, 60041. The **Subject Parcel** is addressed from “James Anderson, 67 S Elm St., Fox Lake, IL 60020,” and is addressed to “Michael Robinson, P.O. Box 248 Bristol, TN 37621.” The **Subject Parcel** bears \$60.15 in postage, measures approximately 30 inches by 24 inches by 6.25 inches, and weighs approximately 6.9 pounds.

6. I observed several characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance.

7. First, I ran the sender and recipient names and addresses on the **Subject Parcel** through a law enforcement database. According to that database, the sender name, “James Anderson,” does not associate with the sender address of “67 S Elm St., Fox Lake, IL 60020.” the listed recipient, “Michael Robinson,” also does not associate with the recipient address of “P.O. Box 248, Bristol, TN 37621.” Further, according to the law enforcement databasethe phone numbers provided on the shipping label for the sender and recipient do not associate with the sender and recipient names. Based on my training and experience, fictitious sender or receiver

names, fictitious return addresses, or fictitious phone numbers can indicate that the sender or receiver does not want to be associated with the parcel. .

8. Each of the characteristics I describe above can be consistent with parcels that do not contain contraband. Based on my training and experience, however, the combination of these characteristics led me to investigate further by calling in a narcotics dog to perform further examination of the **Subject Parcel**.

9. On January 10, 2024, I arranged for a Des Plaines Police Officer and his canine partner, "Jager," to meet with me and examine the **Subject Parcel**. According to the Canine Officer, Jager is certified annually by Illinois Law Enforcement Training and Standards Board as a narcotics dog. Jager was most recently re-certified on March 3, 2023. Jager is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of marijuana, methamphetamine, heroin, and cocaine that could be contained inside. Jager is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing.

10. In addition, according to USPIS records, Jager has successfully alerted to controlled substances and other items believed to have been in contact with controlled substances, including United States currency, paraphernalia, and packaging, further described in Attachment B, in U.S. Mail Parcels and letters on 118 occasions since March 2023, with a success rate of approximately 94%. To the best of my knowledge, U.S. Customs and Border Protection does not maintain records

regarding the overall success rate for drug detection dogs, and therefore only the USPS success rate is available.

11. On January 10, 2024, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, I arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 11 other parcels in the workroom area. I then witnessed Jager examine the parcels and observed Jager alert by sitting down next to the **Subject Parcel**. Jager did not alert to any of the other parcels. The Canine Officer informed me that Jager's actions indicated the presence of narcotics and/or controlled substances in the **Subject Parcel**. I then took custody of the **Subject Parcel**.

12. Additionally, based on my training and experience: (i) individuals who engage in the trafficking of illegal controlled substances often exchange cash through the mail; (ii) money that is handled by individuals who also handle drugs or is in the vicinity of drugs can retain the scent of drugs, which dogs can smell; and (iii) in other such cases, narcotics dogs have alerted to a package that has contained money.

II. CONCLUSION

13. Based on the above information, I respectfully submit that there is probable cause to believe that narcotics offenses, in violation of Title 21, United States Code, Section 843(b), have been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the Subject Parcel, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel**

more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.

Jazzy Pedregosa

Jazzy Pedregosa
Task Force Officer
U.S. Postal Inspection Service

Sworn to and affirmed by telephone 16th day of January, 2024

Gabriel A. Fuentes

Honorable GABRIEL A. FUENTES
United States Magistrate Judge

ATTACHMENT A

DESCRIPTION OF ITEM TO BE SEARCHED

The **Subject Parcel** is a U.S. Express Mail Parcel with Tracking Number EI 350 581 519 US, and it is addressed to “Michael Robinson, P.O. Box 248 Bristol, TN 37621,” with a return address of “James Anderson, 67 S Elm St., Fox Lake, IL 60020.” The **Subject Parcel** bears \$60.15 in postage, measures approximately 30 inches by 24 inches by 6.25 inches, and weighs approximately 6.9 pounds.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities, and contraband concerning violation of Title 21, United States Code, Section 843(b) (the “**Subject Offense**”), as follows:

1. Controlled substances;
2. Packaging for controlled substances;
3. United States currency that constitutes evidence, instrumentalities, or fruits of the **Subject Offense**;
4. Paraphernalia associated with the use, possession, manufacturing, packaging, processing, and distribution of controlled substances, including but not limited to, adulterants, dilutants, cutting agents, scales, needles, grinders, heat-sealing devices, plastic bags, and money-counting devices; and
5. Items that identify the sender or intended recipient of the **Subject Parcel**.